

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

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SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

MICHAEL L. COHEN and  
VANJA BAROS,

Defendants.  
-----X

Civ. Action # 17 CV-00430-NGG-LB

D/F

**JOINT MOTION FOR A REVISED SCHEDULING ORDER**

In light of Plaintiff Securities and Exchange Commission's (the "Commission") Amended Complaint, filed May 29, 2017, the parties respectfully move jointly to extend the current motion to dismiss briefing schedule to allow: a) the Defendants to serve renewed Motions to Dismiss by June 27, 2017, b) the Commission to serve oppositions to the Defendants' renewed Motions to Dismiss by July 28, 2017, and c) the Defendants to reply to the Commission's oppositions and file the fully briefed motions by August 18, 2017.

The Defendants' original Motions to Dismiss were due, and were served on the Commission, on May 8, 2017. Under the schedule ordered by the Court on May 30, 2017, the Commission's opposition is due on July 14, 2017 and replies and filing of the fully briefed motion are due on August 9, 2017. The requested extension would allow the Defendants the opportunity to analyze and respond to the Amended Complaint, would give the Commission adequate time to respond to the issues raised in the Defendants' renewed Motions to Dismiss, and would give the Defendants time to respond to the issues raised in the Commission's

Oppositions. The parties' proposed changes to the briefing schedule would only extend the current schedule by nine days.

This is the parties' second request for an extension regarding the Motions to Dismiss, and it is necessitated by the Commission's recent filing of an Amended Complaint. The parties previously moved for and were granted an extension of time for the Commission to serve oppositions to the Defendants' Motions to Dismiss and for the Defendants to reply to the Commission's oppositions. The parties also previously moved for and were granted an extension of time to serve initial disclosures and file their joint Rule 26 report.

Dated: June 1, 2017

*Application granted.  
for order.*

s/Nicholas G. Garaufis

*6/5/17*

Respectfully submitted,

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